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September 27, 2010

VIA E-MAIL AND U.S. MAIL

Bethany Dreyfus
Assistant Regional Counsel
United States Environmental Protection Agency
Region IX - ORC-3
75 Hawthorne Street
San Francisco, CA 94105

RE: Crane Co. / Formal Dispute Resolution Statement of Position

Dear Bethany:

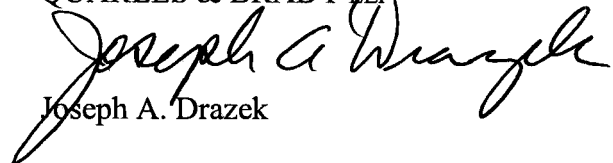
Pursuant to Paragraphs 87 and 88 of the Partial Consent Decree, Crane Co. hereby invokes the formal dispute resolution procedures of those paragraphs by serving the attached Statement of Position that addresses the matter in dispute - namely EPA's requirement that Crane Co. install two injection wells in addition to the three injection wells agreed to by Crane Co. As explained in the Statement of Position, site data already gathered from two of those injection wells (IA-11 and IA-12) in just one month coupled with projections based on that data for the third injection well (IA-13) demonstrate that those three wells combined with the effects associated with the start-up of EA-07 will provide effective hydraulic control and containment of the Subunit A plume's northeast area. EPA's position supporting its requirement for two additional injection wells is not technically justified and, in Crane's view, is arbitrary. Crane Co. reiterates that it is fully committed to preventing the possible expansion of the TCE plume. The

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steps Crane Co. has agreed to take are consistent with sound scientific technical judgment and will prevent plume expansion in the northeast area.

Sincerely,

QUARLES & BRADY LLP



Joseph A. Drazek

JDRAZEK:psm

Enclosure

cc: Chief, Environmental and Enforcement Section, Environment and Natural Resources
Division, U.S. Department of Justice (w/encl.)
Jane Diamond (w/encl.)
Catherine Brown (via email and mail w/encl.)
David Wood (w/encl.)
Nicole Coronado (w/encl.)
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